RCRA ~~PART B~~ PERMIT

FOR THE

IDAHO NATIONAL LABORATORY

Volume 14
INTEC Liquid Waste Management System

Attachment 3, Section F-1
Security

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CONTENTS

ACRONYMS

CFA	Central Facilities Area
CFR	Code of Federal Regulations
CPP	Chemical Processing Plant
DCS	Distributed Control System
DOE	Department of Energy
DOE-ID	Department of Energy, Idaho Operations Office
ETS	Evaporator Tank System
HEPA	high-efficiency particulate air
IDAPA	Idaho Administrative Procedures Act
INL	Idaho National Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
IWTU	Integrated Waste Treatment Unit
LET&D	Liquid Effluent Treatment and Disposal
PEWE	Process Equipment Waste Evaporator
RCRA	Resource Conservation and Recovery Act
TFT	Tank Farm Tank
TSDF	treatment, storage, or disposal facility
WAC	waste acceptance criteria
WWH	Westside Waste Holdup

F. PROCEDURES TO PREVENT HAZARDS

The Process Equipment Waste Evaporator (PEWE), Liquid Effluent Treatment and Disposal (LET&D) ~~systems~~facility, ~~and~~ the Evaporator Tank System (ETS), and the Integrated Waste Treatment Unit (IWTU), referred to as the Idaho Nuclear Technology and Engineering Center (INTEC) Liquid Waste Management System (ILWMS), are designed and operated to minimize exposure of the general public, operating personnel, and the environment to hazardous waste stored and treated at the Idaho Nuclear Technology and Engineering Center (INTEC). The Idaho National Laboratory (INL) Site provides procedures, equipment, and structures to prevent, mitigate, or respond to environmental or human hazards. Inspection plans and schedules are followed for the PEWE system, LET&D facility, ~~and~~ ETS, and IWTU ensuring these facilities and their associated equipment are properly maintained and operated as mandated in the Idaho Administrative Procedures Act (IDAPA) and the Code of Federal Regulations (CFR).

F-1. Security

Specific security measures taken for INTEC include fencing, warning signs, keycard access or personnel sign-in, and building locks.

F-1a. Security Procedures and Equipment [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR §§ 264.14 and 270.14(b)(4)]

A security system, physical control procedures, and equipment control access to INTEC. A security force operates the security system.

The security force's operations are consistent with Department of Energy, Idaho Operations Office (DOE-ID) directives and orders on access control. The DOE operates a personnel security clearance program to ensure that employees who are required to have a clearance to perform their duties are evaluated and cleared consistently with DOE-ID security policies.

Fencing, guarded gates, and uniformed guards with communication devices are used at INTEC. There are internal communication devices, such as a telephone system in occupied buildings at INTEC. The same communication devices are used for communication outside of the plant. The INTEC also has a plant-wide voice paging system that is used to announce critical information regarding security and safety.

F-1a(1) 24-Hour Surveillance System [IDAPA 58.01.05.008; 40 CFR § 264.14(b)(1)]

Security at INTEC is provided by trained security guards, who monitor the entry and egress of people and material from the INTEC facility. The main INTEC guard gate at the west side of INTEC is staffed with guards 24 hours a day, seven days a week. There are other gates into INTEC, and they are either locked or staffed with guards. The guards also perform other security functions within the plant premises, including patrolling the perimeter fence and areas throughout INTEC on a 24-hour basis.

F-1a(2) Barrier and Means to Control Entry [IDAPA 58.01.05.008; 40 CFR § 264.14(b)(2)(i)]

The treatment, storage, or disposal facilities (TSDFs) at INTEC are enclosed within a fence. All gates into INTEC are either locked or manned with security guards.

F-1a(2)(a) Barrier

The INTEC facility is located approximately 42 air miles west of the largest nearby population area, Idaho Falls, Idaho. The entire INTEC facility area is enclosed within a fence. There are gates in the perimeter fences, but only three guarded gates. These gates are identified with the Guard Post (building) where they are located. The Guard Posts are numbered P-501 (CPP-1686), P-507 (CPP-661), and P-521 (CPP-697). The other gates are locked but can be opened by patrols when requested.

F-1a(2)(b) Means to Control Entry [IDAPA 58.01.05.008; 40 CFR § 264.14 (b)(ii)]

Employees, sub-contractors, or vendors that have completed required access training and have keycard access are not escorted in the general INTEC interior.

Individuals that have the required access training but do not have keycard access sign an "Employee Log" and are allowed into INTEC without being escorted.

Individuals that do not have the required access training and do not have keycard access are escorted and sign a "Visitors Log" to gain access to INTEC.

CPP-604 PEWE System and TFT

For purposes of Section F, Procedures to Prevent Hazards, the PEWE system and the CPP-604 Tank Farm Tanks (TFT) system will be addressed jointly, as both regulated systems are located within the same building, CPP-604.

The Resource Conservation and Recovery Act (RCRA) regulated units in CPP-604 are located in cells or vaults. Access to these cells and vaults are limited due to radiological controls. Personnel access to the condensate collection cell, the EVAP-WL-161 evaporator cell, the EVAP-WL-129 evaporator cell, and the feed pump cell is gained through the condensate collection cell door. The cell door is normally locked limiting access. The facility entrance access has a sign that limits access to authorized personnel.

Access to the VES-WL-132 vault, the VES-WL-133 vault, the VES-WM-100 vault, and the VES-WM-101/VES-WM-102 vaults is limited by high-density reinforced concrete hatch covers, which weigh greater than 1 ton each. The hatch covers can be removed only with the use of a crane.

CPP-641 Tanks

The three CPP-641 tanks (VES-WL-103, VES-WL-104, and VES-WL-105) are located in two underground vaults north of CPP-641. The instrumentation, motor control center, sample station, and valves are located inside CPP-641. A ladder in CPP-641 provides access to the VES-WL-103 vault. Access to both vaults is limited, but can be gained by removing hatches and concrete plugs located north of CPP-641. The building entrance has a sign that limits access to authorized personnel.

CPP-601 Deep Tanks

Access to the cells is through hatch covers, which are only removed during maintenance operations.

The pumps for the Deep Tanks are located in pump pits adjacent to the cells. Access to the pump pits is restricted because the pump pits are high contamination areas and high radiation areas. The door to the Deep Tanks Control Room has a sign limiting access to authorized personnel. The doors to the pump pit are normally locked, and the area supervisor controls the keys.

CPP-1618 LET&D

The Liquid Effluent Treatment and Disposal (LET&D) facility tanks and fractionators are located in two cells within Building CPP-1618. Access is gained through doors on the main level of the building. The doors to the building have signs limiting access to authorized personnel only. The cell doors are kept locked when the facility is in operation.

Nitric Acid Recycle Tank Vault

VES-NCR-171 and VES-NCR-173 are located in the CPP-659 Annex. Access is gained through doors on the main level of the building. The door to the building has signs limiting access to authorized personnel only. The door is normally locked, and the area supervisor controls the keys.

CPP-659 ETS

The evaporator and associated equipment is located within cells at CPP-659. Access is gained through doors on different levels of the building and hatches in the ceiling of the cells. Doors within the building that provide personnel access to areas where process equipment and hazardous waste is located have signs limiting access to authorized personnel only. The cell doors are normally locked and the area supervisor controls the keys.

CPP-1696 IWTU

The steam reformers and associated equipment are located within cells at CPP-1696. Access is gained through doors on the main level of the building. Doors within the building that provide personnel access to areas where process equipment and hazardous waste are located have signs limiting access to authorized personnel only. The cell doors are normally locked and the area supervisor controls the keys.

F-1a(3) Warning Signs [IDAPA 58.01.05.008; 40 CFR § 264.14(c)]

Warning signs that are visible and legible from at least 25 ft are posted at facility entrances. Entrances into RCRA storage or treatment areas have, at a minimum, signs reading "**DANGER**-- Unauthorized Personnel Keep Out."